

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <u>et al.</u> ,	)	Case No. 01-1139 (JKF)
	)	Jointly Administered
Debtors.	)	Related to Docket No. 18501
	)	
		Objection Deadline: May 16, 2008 at 4:00 p.m.
		Hearing Date: June 2, 2008 at 1:00 p.m.
		United States Bankruptcy Court for the Western
		District of Pennsylvania, 5414, Courtroom A, USX
		Tower, 600 Grant Street, Pittsburgh, PA 15219

**AMENDED NOTICE OF MOTION OF MIAN REALTY, LLC FOR ENTRY OF ORDER  
DECLARING THAT (i) THE AUTOMATIC STAY DOES NOT APPLY  
TO FILING OF ITS PROPOSED THIRD PARTY COMPLAINT  
AGAINST DEBTOR; AND (ii) DEBTOR'S OBLIGATION TO  
CLEANUP CERTAIN REAL PROPERTY DOES NOT  
CONSTITUTE A CLAIM UNDER THE BANKRUPTCY CODE**

TO: Parties on the attached service list

**PLEASE TAKE NOTICE** that on April 11, 2008, Mian Realty, LLC ("Mian"), by and through its attorneys, filed a Motion For Entry of Order Declaring that (i) the Automatic Stay Does Not Apply to the Filing of Its Proposed Third Party Complaint Against Debtor; and (ii) Debtor's Obligation to Cleanup Certain Real Property Does Not Constitute a Claim Under the Bankruptcy Code (the "Motion") (Docket No. 18501). A copy of the Motion was previously served and noticed for the May 19, 2008 omnibus hearing scheduled for these cases.

**PLEASE TAKE FURTHER NOTICE** that the omnibus hearing originally scheduled for May 19, 2008 has been re-scheduled for **June 2, 2008 at 1:00 p.m.** before the Honorable Judith K. Fitzgerald, in United States Bankruptcy Court for the Western District of Pennsylvania, 5414, Courtroom A, USX Tower, 600 Grant Street, Pittsburgh, PA 15219.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion or the relief requested therein must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801, and served upon the undersigned counsel, no later than **4:00 p.m. on May 16, 2008**.

Dated: April 30, 2008

**TRENK, DiPASQUALE, WEBSTER,  
DELLA FERA & SODONO, P.C.**

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-and-

**COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, PA**

By: 

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